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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING
MOTION TO SEAL**

Referral: Hon. Susan van Keulen, USMJ

PATRICK CALHOUN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-05146-YGR-SVK

**[PROPOSED] ORDER GRANTING
MOTION TO SEAL**

Referral: Hon. Susan van Keulen, USMJ

[PROPOSED] ORDER

Before the Court is Google LLC's Administrative Motion to Seal ("Motion") portions of the Joint Submission Pursuant to *Brown* Dkts. 861 & 877 and *Calhoun* Dkts. 983 & 990.

Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Documents Sought to Be Sealed	Court's Ruling on Motion to Seal	Reason(s) for Court's Ruling
Joint Submission Pursuant to <i>Brown</i> Dkts. 861 & 877 and <i>Calhoun</i> Dkts. 983 & 990	GRANTED as to the portions at: Pages 1:2-3, 1:16, 1:21-22, 2:1-2, 2:4, 2:12, 2:14-16, 2:18, 2:20, 2:22, 2:25, 3:1, 3:3-5, 3:9, 3:13, 3:18, 3:24-28, 4:2-4, 4:20, 4:25-27, 5:2, 5:4, 5:6, 5:8-9, 5:15, 5:20, 5:24-25, 5:27-28, 6:5, 6:12, 6:14, 7:8, 7:10, 7:12-13, 7:16, 7:18, 7:20, 7:24-28, 8:3, 8:7, 8:14, 8:18, 8:25, 8:27-28, 9:1, 9:3, 9:7-9, 9:16, 9:18-20, 10:2, 11:17-19, 11:25, 11:27, 12:3, 12:13-14, 12:20-21, 13:3, 14:7, 14:9, 14:19, 14:24-26, 15:4-6, 15:9-11, 15:18, 15:20, 15:22-23	The information requested to be sealed contains non-public, sensitive confidential business information related to Google's internal technological systems that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google's internal projects, internal data sources, and their proprietary functionalities, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.
Exhibit A – Feb. 6, 2023 <i>Calhoun</i> Letter to Google	GRANTED as to the portions at: PDF Pages 2-4	The information requested to be sealed contains non-public, sensitive confidential business information related to Google's internal technological systems that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google's internal projects and data sources, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems. Public disclosure of such

		confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.
Exhibit B – Feb. 17, 2023 Google Letter to <i>Brown</i> and <i>Calhoun</i>	GRANTED as to the portions at: Pages 1-7	The information requested to be sealed contains non-public, sensitive confidential business information related to Google's internal technological systems that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google's internal projects, internal data sources, and their proprietary functionalities, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.

SO ORDERED.

DATED: _____

THE HONORABLE SUSAN VAN KEULEN
United States Magistrate Judge